

REMARKS

Applicant requests favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1-28 are pending in this application, with Claims 1, 2, 6, 12, 13, 15, 16, 17, 19, 20, 23, and 26 being independent.

Claims 1, 12 and 16 have been amended. Applicant submits that support for these amendments can be found in the original disclosure at least, for example, at page 10, line 19 through page 11, line 19. Therefore, no new matter has been added.

Claims 1, 12, and 16 stand rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent No. 6,504,941 (Wong). Applicant respectfully traverses this rejection for the reasons discussed below.

As recited in Claim 1, the present invention recites, *inter alia*, the features of designating data to be modified in data corresponding to an original image, modifying the designated data using processing that respectively corresponds to each user receiving data corresponding to the original image, and embedding a digital watermark corresponding to each respective user in the data that corresponds to the original image and includes the modified data. With these features, an original image can be protected against tampering and a digital watermark can be embedded that is robust against alliance and average value attacks.

Applicant submits that the cited art fails to disclose or suggest at least the above-mentioned features of the present invention recited in Claim 1. In particular, Applicant submits that Wong discloses embedding a digital watermark in an image that corresponds to the *owner* of the image. However, that patent fails to disclose or suggest modifying designated data in data corresponding to an original image using processing that respectively corresponds to each user receiving data corresponding to the original image, or embedding a digital watermark corresponding to each respective user in the data that

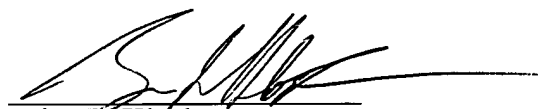
corresponds to the original image and includes the modified data. Accordingly, Applicant submits that the present invention recited in Claim 1 is patentable over the cited art.

Independent Claims 12 and 16 recite features similar to those of Claim 1 discussed above and are believed patentable for similar reasons.

In view of the foregoing, this application is believed to be in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejection, and an early Notice of Allowance are requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202)530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. L. Klock', written over a horizontal line.

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